REMARKS / ARGUMENTS

Claims 1-26 have again been rejected under 35 USC 102(e) as being anticipated by Habegger (US Pat. No. 6,643,642 B1) ("Habegger"). Habegger clearly states in the "FIELD OF THE INVENTION" that "the invention relates generally to the field of **databases**". By contrast, as stated in Applicant's "FIELD OF THE INVENTION", Applicant's claimed invention relates to "**graphical user interfaces**". Although each employs a hierarchical data structure, each invention uses it in a **different** way, with different additional elements, and for a **different** purpose. Thus, the similarity is merely one of **abstract form**, and not of **actual substance**.

Habegger uses the abstract form of a hierarchical data structure to facilitate searching of the database (see Field of the Invention). By contrast, Applicant uses the abstract form of a hierarchical data structure to facilitate **display** of a plurality of **machine vision elements** (See Summary of the Invention). The hierarchical data structure of Applicant's invention is enhanced with the display of **DATA FLOW** relationships that are **non-hierarchical**, and these non-hierarchical relationships are used to **display** these **non**-hierarchical **data flow relationships** among the **machine vision elements** that are displayed hierarchically.

The term "**data flow**" can have a variety of meanings in the field of computing. For example, Wikipedia (the free online encyclopedia) states that

"Dataflow is a term used in computing, and may have various shades of meaning." One shade of meaning is in the context of "Diagrams", wherein Wikipedia states (on a Wikipedia page that was last modified 30 January 2006): "The term **data flow** may also be used to refer to the flow of data within a system, and is the name normally given to the arrows in a **data flow** diagram that represent **the flow of data** between external entities, processes, and data stores." It is this sense of "**data flow**" that Applicant is using in the specification and the claims.

The Examiner disagrees with arguments mailed 9/2/05 for three reasons. The first reason is that the Examiner disagrees that "Habegger is silent on any teaching of 'machine vision entities'". The Examiner supports the disagreement by asserting that:

> "Habegger clearly teaches in figs. 6 and 7A-B that different application **visions** shown as nodes on the hierarchical and non-hierarchical relationships of the particular software or folders, i.e., Education Programs including different application **visions**/folders such as Paint, Draw, Art Progs, Typing Progs, are grouped under the same tree supporting the main software; therefore the software and its applications as shown in fig. 6 are similar to the "machine vision entities" as shown in fig. 3a of the Applicant's specification."

The Examiner uses the phrase "application **visions**" twice in his statement. This suggests that the Examiner is confusing the meaning of "machine vision entity" due to a misunderstanding of the word "vision". It would be speculation as to why the Examiner misunderstands the phrase "machine vision entities", but Applicant can now confidently assert that due to the Examiner's misuse and misunderstanding of the word "visions" above, the Examiner does NOT correctly understand the phrase "machine vision entities".

Anyone skilled in the art of Machine Vision would be able to agree that a "machine vision entity" is an entity somehow related to a machine vision system, such as a camera, a vision processor, or a machine vision tool, for example. Thus, machine vision tools such as Blob, Caliper, and Search are also machine vision entities. By contrast, "Education programs" are not "machine vision entities", in that Education programs cannot perform any significant machine vision functions. Further, Education programs operate differently than "machine vision entities", in that they require different inputs, provide different outputs, and process data differently.

In fact, Figs. 6, and 7A-B of Habegger are silent on **any** teaching of Machine Vision", and anyone skilled in the art of machine vision would surely agree, but the Examiner uses his disagreement as the basis for rejection of the claims. The Examiner's argument is clearly based on a misunderstanding of the word "vision", but one of average skill in English, and of average skill in the art of Machine Vision would not make such a mistake. Therefore, the Examiner's

argument asserting any teaching of "machine vision" in Habegger, is deemed to be overcome.

The second reason is that the Examiner asserts that "data can be shared or flowed under the same tree". However, Habegger is totally silent on any aspect of "data flow" as defined above by Applicant. As stated above, "The term **data flow** may also be used to refer to the flow of data within a system, and is the name normally given to the arrows in a **data flow** diagram that represent **the flow of data** between external entities, processes, and data stores." It is this sense of "**data flow**" that Applicant is using in the specification and the claims. By contrast, there is NO flow of data in Fig. 6. With reference to col. 7, lines 24-33, Instead, there are "cross-links" between nodes that "provide pointers between data nodes". Clearly, anyone skilled in the art of computing would understand that a "cross link" is NOT a data flow relationship, and the "cross links" are not lines indicating data flow between the nodes.

The Examiner is stating and/or implying that just because a "cross-link" is established between two nodes, "data can be flowed now". However, Habegger is totally silent on any data flowing, and further, data CANNOT flow when a "cross-link", as taught by Habegger, is established between two nodes. In fact, the Examiner actually makes up a name for the "cross link" "dashed line" 606a, calling it a "data-link-flow" 606a. <u>This is purely a creation of the Examiner, and is NOT present in Habegger.</u> Therefore, Habegger does NOT teach a plurality of

non-hierarchical data flow interrelationships, as required by the claims of Applicant. The Examiner's argument is therefore deemed to be overcome.

The third reason is the Examiner does not agree that "Habegger does not teach display or construction of an enhanced tree-style graphical representation". Although Habegger does teach a user interface (see Figs. 1 and 2, for example), the diagram in Fig. 6 is NOT part of that user interface. Nothing even resembling Fig. 6 is ever presented to the user of the user interface. Habegger is totally silent on presenting such a diagram to a user. By contrast, Applicant discloses and claims "A method for generating an enhanced tree-style graphical representation of interrelationships among a plurality of machine vision entities for display as a graphical user interface on a screen of a visual display unit of a machine vision system", as set forth in claim 1, for example.

To conclusively prove that the user interface does NOT include the diagram of Fig. 6, refer to the BRIEF DESCRIPTION OF THE DRAWINGS. Figs. 4 and 5 are described as being "a logical representation of an alternative search results **display screen**". However, the phrase "display screen" is **not** used to describe Fig. 6. Thus, Fig. 6 is NOT part of any graphical user interface on a screen of a visual display unit of a machine vision system, as claimed. Fig. 6 is merely a conceptual diagram for purposes of explaining the relationships between data nodes to the reader of the patent. Accordingly, the Examiner's argument is deemed to be overcome.

Accordingly, Applicants assert that the present application is in condition for allowance, and such action is respectfully requested. The Examiner is invited to phone the undersigned attorney to further the prosecution of the present application.

Respectfully Submitted,

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